

1 McGREGOR W. SCOTT
United States Attorney
2 ANDRÉ M. ESPINOSA
KEVIN KHASIGIAN
3 Assistant United States Attorneys
501 I Street, Suite 10-100
4 Sacramento, CA 95814
Telephone: (916) 554-2700
5 Facsimile: (916) 554-2900

6 Attorneys for Plaintiff
United States of America
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8
9 IN THE UNITED STATES DISTRICT COURT

10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,
13 v.

14 RYAN GUIDRY,

15 Defendant.
16

Case No.: 2:20-CR-00003-JAM

**STIPULATION FOR THE DEPOSIT OF FUNDS
INTO THE COURT'S DEPOSIT FUND; AND
ORDER THEREON**

[No Hearing Requested]

17
18 Plaintiff United States of America and defendant Ryan Guidry ("Defendant"), through their
19 respective counsel (together, the "Parties"), hereby seek an order directing the Clerk of Court to deposit
20 Defendant's previously made \$250,000 payment into the Court's Deposit Fund pending the outcome of
21 this criminal prosecution.

22 The Parties stipulate and agree as follows:

23 1. The Information in this case charges Defendant with violations of Title 18, United States
24 Code, Section 371—Conspiracy to Commit an Offense Against the United States ("Count One"), and
25 Title 18, United States Code, Sections 2 and 1957(a)—Aiding and Abetting Money Laundering ("Count
26 Two"). He entered a guilty plea to both Counts pursuant to the Parties' plea agreement filed on January
27 14, 2020 (ECF No. 13). According to the plea agreement, Defendant is subject to a special assessment,
28 fine, and restitution in an amount yet to be determined but that the Parties agreed would likely be

1 between approximately \$600 million and \$1 billion.

2 2. The Court entered Defendant's guilty plea and adjudged him guilty following his change
3 of plea hearing. ECF No. 8. Sentencing is currently set for December 15, 2020. ECF No. 16.

4 3. On or about October 8, 2020, Defendant delivered \$250,000 in pre-judgment restitution,
5 which has been paid to the Clerk of the Court. The Parties seek an order from the Court approving this
6 stipulation and the deposit of those funds in an account maintained by the Clerk of the Court until the
7 Court imposes judgment and orders restitution.

8 4. Based on the foregoing, the Parties agree the Court can and should enter an order
9 directing the Clerk of Court to deposit Defendant's \$250,000 payment into the Court's Deposit Fund and
10 to apply those funds to all criminal monetary penalties the Court orders in the case.

11 Respectfully submitted,

12 FOR THE UNITED STATES:

McGREGOR W. SCOTT
United States Attorney

13
14 Dated: 11/17/2020

15 By: /s/ André M. Espinosa
ANDRÉ M. ESPINOSA
16 KEVIN KHASIGIAN
Assistant United States Attorneys

17
18 FOR DEFENDANT RYAN GUIDRY:

19
20 Dated: 11/17/2020

By: /s/ Ryan Guidry (authorized 11/17/2020)
21 RYAN GUIDRY

22 APPROVED AS TO FORM AND CONTENT:

23
24 Dated: 11/17/2020

25 By: /s/ Robert M. Wilson (authorized 11/17/2020)
ROBERT M. WILSON, Counsel for Ryan Guidry

ORDER

The Court, having reviewed the court files and the Parties' Stipulation for the Deposit of Funds into the Court's Deposit Fund (the Stipulation), and good cause appearing therefrom, hereby APPROVES the Stipulation. Accordingly, IT IS ORDERED that:

1. The Clerk of Court is directed to deposit defendant Ryan Guidry's previous \$250,000 payment into the Court's Deposit Fund (the Fund) and to apply those funds to all criminal monetary penalties the Court orders at sentencing; and
2. Defendant's prejudgment payment shall remain in the Fund pending adjudication of this case. Upon sentencing, the Clerk of Court shall apply the payment towards the criminal monetary penalties ordered in the case. If the Court orders criminal monetary penalties in an amount less than Defendant's prejudgment payment, the Clerk of Court shall return the surplus to the Defendant within thirty days following entry of judgment.

IT IS SO ORDERED.

DATED: November 18, 2020

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE